

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

-----X  
JOHN TURNER CONSULTING, INC.

Plaintiff,

v.

TERRACON CONSULTING, INC. and  
CARL THUNBERG,

Defendants.  
-----X

**NOTICE OF REMOVAL**

TO THE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS:

Defendants, Terracon Consulting, Inc. ("Terracon") and Carl Thunberg ("Thunberg")  
collectively, ("Defendants") respectfully submit that:

1. On or about July 16, 2013, Defendants were served with a Summons and  
Complaint in a matter entitled *John Turner Consulting, Inc. v. Terracon Consulting, Inc. and  
Carl Thunberg*, Civil Action SUCV2013-2532-D, which was filed in Massachusetts Superior  
Court, Suffolk County.

2. The process, pleadings, and orders served upon Defendants to date in this matter,  
copies of which are attached hereto as Exhibit A, as follows:

- a. Summons and Order of Notice;
- b. Motion for Special Process Server;
- c. Verified Complaint;

- d. Plaintiff's Motion for Preliminary Injunction;
- e. (Proposed) Order for Preliminary Injunction; and
- f. Plaintiff's Motion for Short Order Notice

3. This Court has original jurisdiction over this civil action pursuant to 28 U.S.C. § 1332, because there is diversity of citizenship, all of the parties being citizens of different states. Plaintiff, John Turner Consulting, Inc. is a New Hampshire corporation with a principal place of business in Dover, New Hampshire. Defendant Terracon is a foreign corporation with a principal place of business in Olathe, Kansas. Defendant Thunberg is a resident of New Hampshire. Further, the sum allegedly in controversy exceeds the \$75,000 jurisdictional prerequisite.

4. Accordingly, this action is removable to this Court under 28 U.S.C. § 1441.

5. Defendants will notify the Suffolk County Superior Court and Plaintiff of this Notice of Removal by filing with the court a Notice of Filing of Notice of Removal. A copy of that notification, is attached hereto as Exhibit B.

Respectfully submitted,

TERRACON CONSULTING, INC. and CARL  
THUNBERG  
By their attorney,

/s/ Stephen T. Paterniti  
Stephen T. Paterniti, BBO # 564860  
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Date: July 25, 2013

**CERTIFICATE OF SERVICE**

This certifies that on July 25, 2013, a copy of the foregoing document was served upon Plaintiff's attorneys, Richard E. Briansky and Andrew L. Baldwin, Prince Lobel Tye LLP, 100 Cambridge Street, Suite 2200, Boston, MA, via first-class mail, postage prepaid.

/s/ Stephen T. Paterniti  
Jackson Lewis, LLP